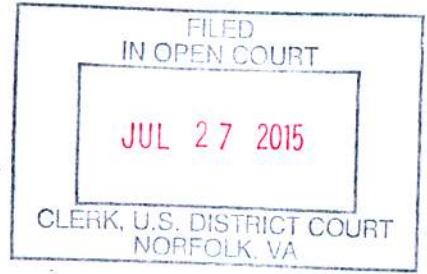


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION



UNITED STATES OF AMERICA)
)
) CRIMINAL NO. 2:15cr65
 v.)
)
 RAYNARD R. HECKSTALL,)
)
)
 Defendant.)

STATEMENT OF FACTS

If this case were to proceed to trial, the evidence presented by the United States would establish the following beyond a reasonable doubt:

1. The defendant, RAYNARD R. HECKSTALL, was employed by the United States Postal Service as a rural carrier assistant at the Princess Anne Station in Virginia Beach, Virginia. He began his employment on April 5, 2014.
2. Between December 2014 and April 2015, the defendant stole, from mail intended to be delivered by him to customers on his assigned route, gift and greeting cards, cash and other items of personal property.
3. As a result of complaints of missing and opened mail by customers on his route, the Postal Service initiated an investigation of the defendant. Video surveillance set up by the Postal Service showed the defendant rifling through and opening mail in his postal vehicle while on his route. In addition, video surveillance footage taken at a Target department store showed the defendant and a friend redeeming a number of the gift cards that the defendant had stolen.
4. In a voluntary interview on April 14, 2015, the defendant admitted to agents of the Postal Service, Office of Inspector General, that he had stolen mail intended for delivery. He

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estimated that since January 2015, he had stolen 7-10 greeting cards three times a week. He also admitted to stealing \$400-\$500 in cash.

5. After the interview, the defendant voluntarily turned over to agents a plastic bag containing 25 gift cards issued by several merchants and vendors, that the defendant had stolen from the mail. These cards had a total value of \$1,090.00.

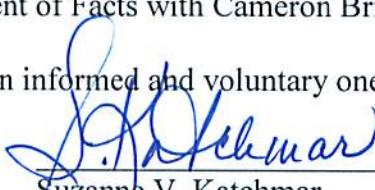
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I hereby stipulate that the above Statement of Facts is true and accurate, and that if this case had proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


Raynard R. Heckstall

I have reviewed the above Statement of Facts with Cameron Briscoe and his decision to stipulate to the accuracy of these facts is an informed and voluntary one.


Suzanne V. Katchmar
Counsel for the defendant

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